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Attorneys for Defendant Broadcaster Inc.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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:
PAUL GOODMAN, individually and in his
capacity as a member of the Board of Directors :
as a Director of Broadcaster Inc., pursuant to
BCL 720, :
:

Plaintiff, : 08 Civ. 2480 (LLS)

-against- : NOTICE OF MOTION

BROADCASTER INC., MARTIN WADE, :
NOLAN QUAN and BLAIR MILLS,

Defendants.

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PLEASE TAKE NOTICE that upon the accompanying Declaration of Michael P. Zweig (attaching the Declarations of Eugene Licker, Esq. and Martin Wade, each dated March 28, 2008), and the accompanying memorandum of law, Defendant Broadcaster Inc., by its attorneys Loeb & Loeb LLP, will move this Court before Hon. Louis L. Stanton at the Courthouse located at 500 Pearl Street, New York, New York 10007, as soon as counsel can be heard for an Order pursuant to 28 U.S.C. §1404(a) transferring this action to the United States District Court for the Central District of California.

PLEASE TAKE FURTHER NOTICE that pursuant to the direction of the Court, answering papers shall be served within 3 business days of service of this motion (*i.e.*, by April 2, 2008).

Dated: New York, New York
March 28, 2008

LOEB & LOEB LLP

By: 

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